IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

In re:		СНАРТ	ER 11 (CASE
EDEN HOME, INC.	§	CASE	NO.	18-50608-cag-11
Debtor.	§			_
	§			

REQUEST FOR EMERGENCY CONSIDERATION OF CERTAIN "FIRST DAY" MATTERS

On March 16, 2018, Eden Home, Inc., the debtor and debtor-in-possession (the "<u>Debtor</u>") in the above captioned case (the "<u>Case</u>") filed petitions for relief under Chapter 11 of the Bankruptcy Code. Counsel for the Debtor believes that the case qualifies as a "Complex Chapter 11 Case." The Debtor needs emergency consideration of the following initial case matters:

- Notice of Designation as Complex Chapter 11 Bankruptcy Cases [D.I. 7];
- Motion for Extension of Time to File Schedules and Statements of Financial Affairs [D.I. 9];
- Emergency Motion for Interim and Final Orders (I) Authorizing the Debtor to Use Cash Collateral; (II) Granting Adequate Protection; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [D.I 16];
- Emergency Motion for an Order Authorizing the Debtor to (I) Pay Certain Prepetition Wages and Other Compensation; and (II) Continue Employee Benefits Programs [D.I. 12];
- Emergency Motion for Order Authorizing the Debtor to (I) Continue to Operate the Cash Management System, (II) Maintain Existing Bank Accounts and Business Forms, and (III) Continue to Perform Intercompany Transactions [D.I. 8];
- Emergency Motion for Order (I) Deeming Utilities Adequately Assured of Future Performance, (II) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Services, and (III) Establishing Procedures for Determining Adequate Assurance Pursuant to.§ 366 Combined with Notice of Opportunity of Hearing [D.I. 15];
- Emergency Motion Authorizing the Debtor to Pay Hilltop Pharmacy, Inc. [D.I. 13];

- Emergency Motion for Order Authorizing the Debtor to (I) Continue Certain Existing Insurance Policies and Premium Financing Arrangements, and (II) Pay Certain Pre-Petition Insurance Financing in the Ordinary Course [D.I. 10];
- Amended Emergency Motion for Order Modifying Automatic Stay to Permit Continuation of Pending Lawsuit [D.I. 17]

Dated: March 16, 2018 Respectfully submitted,

DYKEMA COX SMITH

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By: /s/ *Mark Andrews*

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